# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)
In re:	) Chapter 11
	)
ALEXANDER E. JONES,	) Case No. 22-33553 (CML)
	)
Debtor.	)
	)

# THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALEXANDER E. JONES NOTICE OF RULE 2004 DEPOSITION OF ALEXANDER E. JONES

To: Alexander E. Jones, by and through his counsel of record, Vickie L. Driver, Crowe & Dunlevy PC, 2525 McKinnon Street, Suite 425, Dallas, TX 75201.

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy

Procedure (the "Bankruptcy Rules") and Local Rule 2004-1 of the United States Bankruptcy

Court for the Southern District of Texas (the "Local Rules"), the Official Committee of

Unsecured Creditors (the "Committee") of Alexander E. Jones (the "Debtor") will take the oral deposition of the Debtor. The deposition will take place on September 12 and September 13,

2023, starting at 8:00 a.m. Central Time and continuing throughout the first half of each day, at

3019 Alvin Devane Boulevard, Suite 300, Austin, TX 78741, or at such other date, time and place as the parties may agree.

Please be advised that the scope of the deposition includes, but is not limited to, any matter relevant to: (i) any Document<sup>1</sup> produced in response to any discovery request in this case or in *In re Free Speech Systems, LLC*, No. 22-60043 (CML) (Bankr. S.D. Tex.) (the "FSS Case"), including any banking records and transaction Documents; (ii) the Debtor's Assets,

<sup>&</sup>lt;sup>1</sup> Capitalized terms undefined herein have the meaning ascribed to them in the *Second Notice of the Official Committee of Unsecured Creditors' Bankruptcy Rule 2004 Examination of Alexander E. Jones* [ECF No. 217].

liabilities, and financial condition; (iii) the Debtor's homestead; (iv) any Debtor Related Trusts; (v) any Payments, Transfers, Gifts, or distributions of any Assets involving the Debtor or his entities, directly or indirectly; (vi) any agreements or contracts concerning the Debtor or the Debtor's Assets; (vii) the Debtor's future earning potential; (viii) any plan that may be introduced in the Debtor's bankruptcy or in the FSS Case, insofar as it concerns the Debtor; and (ix) any topics covered in the *Subchapter V Trustee's Initial Findings of Free Speech Systems*, *LLC Investigation* filed on the docket in the FSS Case at ECF Nos. 549 and 550, and the supplement thereto filed at ECF Nos. 573 and 574.

[The remainder of this page intentionally left blank.]

Dated: August 24, 2023 Respectfully submitted,

By: /s/ Marty L. Brimmage, Jr.

Marty L. Brimmage, Jr.

#### AKIN GUMP STRAUSS HAUER & FELD LLP

Marty L. Brimmage, Jr.
Texas Bar No. 00793386
Lacy M. Lawrence
Texas Bar No. 24055913
2300 N. Field Street, Suite 1800
Dellas, Taxas 75201

Dallas, Texas 75201

Telephone: (214) 969-2800 Facsimile: (214) 969-4343

Email: mbrimmage@akingump.com Email: llawrence@akingump.com

-and-

Ira S. Dizengoff (admitted *pro hac vice*)
David M. Zensky (admitted *pro hac vice*)
Philip C. Dublin (admitted *pro hac vice*)
Sara L. Brauner (admitted *pro hac vice*)
Katherine Porter (admitted *pro hac vice*)
One Bryant Park

New York, NY 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002

Email: idizengoff@akingump.com Email: dzensky@akingump.com Email: pdublin@akingump.com Email: sbrauner@akingump.com Email: kporter@akingump.com

Counsel to the Official Committee of Unsecured Creditors of Alexander E. Jones

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 2004-1, I hereby certify that counsel for the Committee conferred with counsel for Alexander E. Jones on the Committee's Rule 2004 notice by email and the parties agreed to the deposition dates on July 25, 2023.

/s/ Marty L. Brimmage, Jr.
Marty L. Brimmage, Jr.

## **CERTIFICATE OF SERVICE**

I certify that on August 24, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Marty L. Brimmage, Jr.
Marty L. Brimmage, Jr.